



Drug and Alcohol Free Workplace

-

Policy No: HR-4-4

Policy Owner: Human Resources

Supersedes: September 1, 2016

Last Reviewed Date: August 2022

Purpose

Donnelley Financial Solutions is committed to protecting the safety, health and well-being of its employees and visitors. Recognizing that drug or alcohol abuse pose a direct and significant threat to this goal, it is the policy of the Company to maintain a workplace that is free from the effects of drug and alcohol abuse

Applicability

This policy applies to all US Donnelley Financial Solutions (“DFIN”) employees.

Policy

DFIN strictly prohibits the use, possession, sale, dispensing, distribution, or manufacture of illegal drugs, intoxicants, or controlled substances in any amount or in any manner when employees are performing Company business, operating Company owned or leased vehicles or equipment, or are on Company premises.

The misuse of alcohol and/or legal, prescribed or over the counter drugs is also prohibited. Under no circumstances should an employee who appears to be under the influence of drugs and or alcohol remain at physically at work, continue to work from a remote location and/or be permitted to drive. Violation of this policy may result in discipline, up to and including separation.

Procedures

1. **Drug and Alcohol Screening** – Employees/applicants will be subject to testing under the following circumstances.
 - a. Pre-Placement/Post Offer

- i. Applicants for positions designated by DFIN as “safety sensitive” must submit to drug testing.
 - ii. A positive test result will result in rescission of DFIN’s offer of employment and the applicant will be ineligible to reapply for a period of one year.
- b. Reasonable Suspicion/For Cause
 - i. Alcohol and/or drug testing will be conducted if there is a “reasonable suspicion” that an employee is under the influence or has violated this policy. Reasonable suspicion” must be based on specific observations concerning the behavior, appearance, actions, speech, or body odors of the employee.
 - ii. An employee who displays behavior that is threatening or who engages in an act of violence as defined by the Company’s Workplace Violence Policy may be subjected to an alcohol and/or drug screen.
- c. Post-Accident
 - i. When a work-related accident occurs (other than one requiring only minor first aid), the Company may test the employees involved for alcohol and drugs if there is a reasonable possibility that alcohol or drug use was a contributing factor to the cause or response to the accident.

2. Employee Self-Identification

- a. To Management
 - i. Employees who voluntarily acknowledge a substance abuse problem to management (prior to being selected for random testing, reasonable suspicion testing, post-accident testing or return to duty testing) will receive a mandatory referral to the Employee Assistance Program (EAP). The Employee will be removed from the work schedule until they are evaluated by the EAP, have a treatment plan provided by the EAP, and provide a negative test result.
 - ii. To ensure the safety of the facility and employees, the employee will be required to submit to testing and may be subject to up to six unannounced tests within a 12- month period.
 - iii. If the employee tests positive or fails to attend or successfully complete the prescribed counseling program, they will be treated under the guidelines set below under Consequences of Unsuitable Samples or Positive Test Results.
- b. To EAP/Other Treatment Facility
 - i. Employees may voluntarily seek treatment from the EAP or other treatment service without notification to management.

3. Testing Procedures

- a. Each DFIN location will work with the chosen vendor to establish procedures for collection of specimens for testing.
- b. Alcohol tests should be completed within two hours of the observations or accident and

the drug screens should be completed within eight hours of the observations or accidents. If unable to test within the recommended time frames, the supervisor should record the reason for the delay.

- c. Specimens for drug testing will be analyzed at a SAMHSA (Substance Abuse and Mental Health Services Administration) certified or approved licensed medical facility.
- d. An employee who is referred to the EAP as a result of self-identification will be subject to periodic, unannounced alcohol and/or drug testing.
- e. An employee refusing to test under any of the required circumstances will be separated.

4. Consequences of Unsuitable Samples or Positive Test Results

- a. Unsuitable Samples - When the sample is unsuitable for testing because it is diluted or the temperature is out of range, or it is unsuitable for any other reason, the employee must provide another sample.
- b. Two unsuitable samples are grounds for immediate separation or withdrawal of an employment offer.
- c. Positive Test Results - Any positive test results for drug or for alcohol will result in immediate separation.

5. Participation in the Employee Assistance Program (EAP)

- a. DFIN has contracted with a professional EAP to provide confidential services, with the cost subsidized by the Company if the employee is enrolled in a Donnelley Financial Solutions Medical Plan.
- b. Benefits-eligible employees who receive a mandatory referral to the EAP are eligible for up to five pre-paid, face-to-face consultations. The cost of any ongoing professional treatment, following these consultations, is the responsibility of the employee.
- c. An employee who has participated in the EAP through a mandatory referral must provide DFIN with a return-to-work authorization from EAP confirming that the employee completed the treatment plan and/or whether the employee has continuing obligations to complete their treatment.

6. Notification of Criminal Drug Conviction

- a. Employees who are convicted of a criminal drug violation must notify the Company within five days of such conviction.
- b. To the extent legally required, the Company will report the conviction to the federal agency with whom the Company contracted.

References

- 1. Last Chance Agreement (form)
- 2. HR Policy 6-7: Employee Assistance Program
- 3. Onsite Alcohol Test Documentation Sheet (form)
- 4. HR Policy 4-14: Performance Counseling
- 5. HR Policy 4-15: Workplace Violence